

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO

**IN RE: DAVOL, INC./C.R. BARD, INC.,
POLYPROPYLENE HERNIA MESH
PRODUCTS LIABILITY LITIGATION**

Case No. 2:18-md-2846

**CHIEF JUDGE EDMUND A. SARGUS, JR.
Magistrate Judge Kimberly A. Jolson**

**This document relates to:
MARCIA NEVERSON**

Case No.: 2:19-cv-04789

**DAVOL INC.'S AND C. R. BARD, INC.'S SHORT FORM ADOPTION BY REFERENCE
ANSWER TO PLAINTIFFS' SHORT FORM ADOPTION BY REFERENCE
COMPLAINT**

Pursuant to Case Management Order No. 9, Defendants Davol Inc. and C. R. Bard, Inc. (“Defendants”), by and through their undersigned counsel, hereby submit their Short Form Adoption by Reference Answer.

Defendants hereby incorporate by reference and adopt, as though restated in full, the Master Answer dated January 2, 2019, including each and every Affirmative Defense, and deny all causes of action in the Master Complaint and Short-Form Adoption by Reference Complaint unless expressly admitted.

This Short-Form Adoption by Reference Answer is not intended to and shall not waive any applicable defenses available to Defendants at this time, and Defendants hereby reserve the right to respond to Plaintiffs individual complaint by way of any motions permissible under the Federal Rules of Civil Procedure or as set forth in CMO No. 9, at section VII.

Defendants demand a Jury Trial on all Counts.

Dated: November 20, 2019

Respectfully submitted,

/s/William D. Kloss, Jr.
William D. Kloss, Jr.
Arryn K. Miner
Henrique A. Geigel
Vorys Sater Seymour and Pease
52 East Gay Street
Columbus, OH 43215
(614) 464-6202
wdklossjr@vorys.com
akminer@vorys.com
hageigel@vorys.com

Michael K. Brown
REED SMITH LLP
355 South Grand Avenue
Suite 2900
Los Angeles, CA 90071-1514
(213) 457-8000
mkbrown@reedsmit.com

Eric L. Alexander
REED SMITH, LLP
1301 K Street, NW
Suite 1000 – East Tower
Washington, DC 20005
(202) 414-9200
ealexander@reedsmit.com

*Counsel for Defendants Davol Inc. and
C. R. Bard, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on November 20, 2019, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which will send a notice of this electronic filing to all counsel of record.

/s/William D. Kloss, Jr.

William D. Kloss, Jr.

*Counsel for Defendants Davol Inc. and
C. R. Bard, Inc*